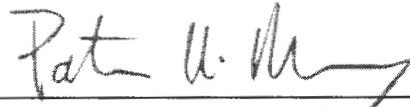


Approved:


PATRICK R. MORONEY
Assistant United States Attorney

Before: THE HONORABLE ONA T. WANG
United States Magistrate Judge
Southern District of New York

23 MAG 1037

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UNITED STATES OF AMERICA : COMPLAINT
:
- v. - : Violation of 21 U.S.C. § 846
:
IVAN ALVARADO MALDONADO, and : COUNTY OF OFFENSE:
MAXIMIANO CAMACHO PEREZ, : BRONX
:
Defendants. :
----- X

SOUTHERN DISTRICT OF NEW YORK, ss.:

MONICA GORA, Special Agent, Department of Homeland Security – Homeland Security Investigations (“HSI”), being duly sworn, deposes and states:

COUNT ONE
(Narcotics Distribution)

1. In or around February 2023, in the Southern District of New York and elsewhere, IVAN ALVARADO MALDONADO and MAXIMIANO CAMACHO PEREZ, the defendants, and others known and unknown, knowingly and intentionally did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that IVAN ALVARADO MALDONADO and MAXIMIANO CAMACHO PEREZ, the defendants, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance that IVAN ALVARADO MALDONADO and MAXIMIANO CAMACHO PEREZ, the defendants, conspired to distribute and possess with intent to distribute was 500 grams and more of mixtures and substances containing a detectable amount of methamphetamine, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Sections 846.)

The bases for my knowledge of the foregoing charges are, in part, as follows:

4. I am a Special Agent with HSI and have been personally involved in the investigation of this matter. This affidavit is based upon my personal participation in the investigation, my examination of reports and records, and my conversations with other law enforcement agents and other individuals. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

5. Based on my participation in the investigation and my conversations with other members of law enforcement, I have learned the following:

a. On or about February 7, 2023, law enforcement agents observed a Ford F-150 with Wisconsin license plates (the “Ford”) in the Bronx driving too closely to the vehicle in front of it, which was a U-Haul with out-of-state plates (the “U-Haul”). Law enforcement agents conducted a traffic stop of the Ford, and identified the Ford’s driver—its sole occupant—as IVAN ALVARADO MALDONADO, the defendant. ALVARADO MALDONADO told agents that he and his friend “Maximo” were driving together from Wisconsin, and that Maximo was driving a “box truck” with furniture and motorcycles.¹

b. Agents conducting the stop were accompanied by a dog that is trained to detect narcotics. When the dog was walked past the Ford, the dog’s handler stated that the dog provided a positive signal for the presence of narcotics. Agents searched the Ford, with the consent of ALVARADO MALDONADO, but did not find any narcotics.

c. Soon thereafter, while still in the Bronx, agents located the U-Haul that the Ford had been following too closely immediately before the Ford was stopped. Law enforcement agents observed the U-Haul nearly make contact with two parked cars on the road, then merge in between two lanes. Agents conducted a traffic stop of the U-Haul. The U-Haul was being driven by MAXIMIANO CAMACHO PEREZ, the defendant, and there were two female passengers. CAMACHO PEREZ consented to a search of the U-Haul but stated that he did not have the key to unlock the back gate of the U-Haul. Law enforcement agents found, in the front “cab” of the truck, a pipe—which resembles that used to smoke methamphetamine—on the floor board near the driver’s side door, and, from inside a black bag in the center console, a plastic bag containing crystals. Those crystals, based on the law enforcement agent’s training and experience, appeared to be methamphetamine.

d. Agents cut open the back gate of the U-Haul and inside found what appeared to be narcotics. The substances field tested positive for methamphetamine, and the total weight of the substances was approximately 18 kilos.


¹ ALVARADO MALDONADO spoke to agents in Spanish. An agent in my group, who speaks Spanish fluently, conveyed the substance of ALVARADO MALDONADO’s statement to me.

e. After identifying the drugs, agents—who had continued to keep ALVARADO MALDONADO under surveillance—arrested ALVARADO MALDONADO nearby and took him into custody.

f. ALVARADO MALDONADO was advised of his *Miranda* rights in Spanish and agreed to speak to law enforcement. ALVARADO MALDONADO stated, in substance and in part, that he was aware that the U-Haul contained drugs and that he had helped load the drugs into the U-Haul. A search of ALVARADO MALDONADO's person incident to his arrest found a key on his person, which fit the U-Haul trunk.

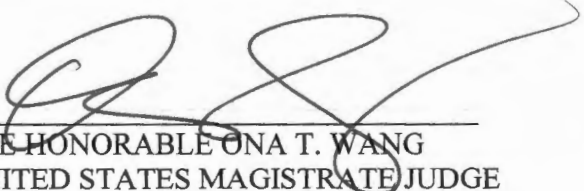
g. CAMACHO PEREZ was also arrested and was advised of his *Miranda* rights in Spanish. CAMACHO PEREZ agreed to speak to law enforcement. CAMACHO PEREZ stated, in substance and in part, that he knew the U-Haul contained drugs and that he was supposed to be paid \$30,000 to deliver the drugs.

WHEREFORE, I respectfully request that IVAN ALVARADO MALDONADO and MAXIMIANO CAMACHO PEREZ, the defendants, be imprisoned, or bailed, as the case may be.



MONICA GORA
Special Agent
HSI

Sworn to before me,
this 8th day of February, 2023



THE HONORABLE ONA T. WANG
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK